



RS-8410-01

IL-0043-11

Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

312/345-9780

Refer to: 03104509 - Cook County - Chicago Heights/Triem Steel
ILD020958298

November 18, 1982

Mr. George C. Ranney
Joseph A. Schudt & Associates
3920 W. 216th Street
Matteson, Illinois 60443

Mr. John Fredericksen
Triem Steel
26th & State Streets
P.O. Box 578
Chicago Heights, Illinois 60411

Gentlemen:

On September 9, 1982 an inspection was made of your facility. It has been determined that your facility is exempt from regulation under 35 Ill. Adm. Code 725 for treatment, storage, and disposal facilities in that your treatment system meets the definition for a "totally enclosed treatment system", and the settling and evaporation ponds meet the definition of a "tank".

Although the results of the analysis done on the sludge from the holding tank show that it is not hazardous by the characteristic of EP toxicity for neither chromium nor lead, 35 Ill. Adm. Code 721.103c states: "Any solid waste generated from the treatment ... of a hazardous waste, including any sludge ..., is a hazardous waste". Triem Steel would therefore be subject to regulation as a generator once the sludge is actually removed from the tank (35 Ill. Adm. Code 722). This waste can be delisted by petitioning to both IEPA and USEPA. This procedure is outlined in 35 Ill. Adm. Code 720.122 and 40 CFR 260.22.

A reply to this letter is requested stating what position Triem Steel will be taking. If there are any questions, please do not hesitate to contact Bonnie Eleder at the above number.

Sincerely,

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:BLE:prb

Enclosure: 35 Ill. Adm. Code 700-725

cc: Division File
Northern Region
U.S. E.P.A. - Region V

EPA Region 5 Records Ctr.



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